

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN SECTION

NICOLE FREEMAN, as wrongful death  
representative of Gershun Freeman and next friend  
of minor child T.F.,

*PLAINTIFF,*

v.

SHERIFF FLOYD BONNER, in his individual  
capacity; CHIEF JAILER KIRK FIELDS, in his  
individual capacity; and SHELBY COUNTY,  
TENNESSEE, a Tennessee Municipality,

*Defendants.*

**Case No. 2:23-cv-02193-MSN-tmp**

**JURY DEMANDED**

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL**

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**COMES NOW** Sara Katherine McKinney of APPERSON CRUMP, PLC, 6000 Poplar Ave., Ste. 150, Memphis, TN 38119, and hereby files her *Motion to Withdraw as Counsel* in the above titled action and moves this Honorable Court for entry of an Order allowing Ms. McKinney to Withdraw as Counsel for Plaintiff, Nicole Freeman, as wrongful death representative of Gershun Freeman and next friend of minor child, T.F. In support of her Motion to Withdraw as Counsel, Ms. McKinney states as follows:

1. Ms. McKinney, as an attorney with APPERSON CRUMP, PLC, represented the Plaintiff in this cause of action.
2. Ms. McKinney has accepted employment with another entity and as such will no longer be employed by APPERSON CRUMP, PLC.
3. Jacob W. Brown, also of APPERSON CRUMP, PLC will be remaining on the matter and will continue to represent the Plaintiff.



4. No party will be prejudiced by the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, Sara Katherine McKinney requests this Honorable Court grant her leave to withdraw as counsel of record for the Plaintiff.

Respectfully submitted on this 16 day of July, 2025.

/s/ Sara Katherine McKinney  
Sara Katherine McKinney (40900)  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing document has been served upon all parties to this action through this Court's ECF filing system this 16 of July, 2025.

/s/ Sara Katherine McKinney

**CERTIFICATE OF CONSULTATION**

I HEREBY CERTIFY that consultation with each of Defendants' attorneys occurred on July 8 and 9, 2025 via telephone call, and no Defendant opposes the relief herein sought.

/s/ Sara Katherine McKinney